

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

A.H.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION FILE
	)	NO. 4:24-CV-00224-WMR
CARSON LOOP ESM, LLC d/b/a	)	
BUDGETEL, and SRINIVAS	)	
BOLLEPALLI,	)	
	)	
Defendants.	)	

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

S.T.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION FILE
	)	NO. 4:24-CV-00225-WMR
CARSON LOOP ESM, LLC d/b/a	)	
BUDGETEL, and SRINIVAS	)	
BOLLEPALLI,	)	
	)	
Defendants.	)	

**SECOND AMENDED NOTICE TO TAKE VIDEOTAPED DEPOSITION**

PLEASE TAKE NOTICE, pursuant to Federal Rules of Civil Procedure 26 and 30, that beginning at 10:00 a.m. on Tuesday, July 22, 2025, at the law offices

of Hall Booth Smith, P.C., 191 Peachtree Street NE, Suite 2900, Atlanta, GA 30303, and continuing from hour to hour and day to day until adjourned, counsel for Plaintiffs shall proceed to take the deposition of **Srinivas Bollepalli**. The deposition will be upon oral examination before an officer authorized by law to administer oaths and to take depositions and will be videotaped. The deposition will be taken for all purposes allowed by law.

This 3rd day of June, 2025.

Respectfully submitted,

**LAW & MORAN**

*/s/ Denise D. Hoying*

Peter A. Law

Georgia Bar No. 439655

E. Michael Moran

Georgia Bar No. 521602

Denise D. Hoying

Georgia Bar No. 236494

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**ANDERSEN, TATE & CARR, P.C.**

/s/ Patrick J. McDonough

Patrick J. McDonough

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*Attorneys for Plaintiffs*

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**CERTIFICATE OF COMPLIANCE**

This is to certify that the foregoing *Second Amended Notice to Take Videotaped Deposition* has been prepared with one of the font and point selections approved by the Court in L.R. 5.1. Specifically, the above-mentioned pleading was prepared using Times New Roman font of 14 point size.

Respectfully submitted,

**LAW & MORAN**

/s/ Denise D. Hoying  
Denise D. Hoying  
Georgia Bar No.236494  
*Attorney for Plaintiffs*

**LAW & MORAN**  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

A.H.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION FILE
	)	NO. 4:24-CV-00224-WMR
CARSON LOOP ESM, LLC d/b/a	)	
BUDGETEL, and SRINIVAS	)	
BOLLEPALLI,	)	
	)	
Defendants.	)	

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S.T.,	)	
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v.	)	CIVIL ACTION FILE
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CARSON LOOP ESM, LLC d/b/a	)	
BUDGETEL, and SRINIVAS	)	
BOLLEPALLI,	)	
	)	
Defendants.	)	

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a true and correct copy of the foregoing *Second Amended Notice to Take Videotaped Deposition* with the Clerk

of Court using the CM/ECF system which will automatically send email

notification of such filing to:

Phillip Friduss  
Jacob O'Neal  
Hall Booth Smith, P.C.  
191 Peachtree Street, N.E.  
Suite 2900  
Atlanta, GA 30303

This 3rd day of June, 2025.

**LAW & MORAN**

/s/ Denise D. Hoying  
Denise D. Hoying  
Georgia Bar No. 236494  
*Attorney for Plaintiffs*

**LAW & MORAN**

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